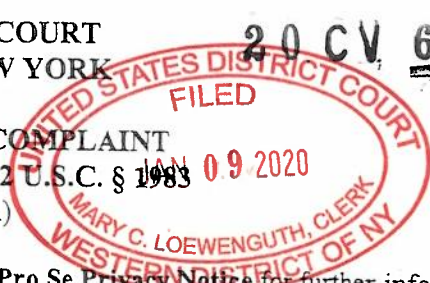


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

FORM TO BE USED IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983
(Prisoner Complaint Form)



All material filed in this Court is now available via the INTERNET. See Pro Se Privacy Notice for further information.

1. CAPTION OF ACTION

A. **Full Name And Prisoner Number of Plaintiff:** NOTE: If more than one plaintiff files this action and seeks in forma pauperis status, each plaintiff must submit an in forma pauperis application and a signed Authorization or the only plaintiff to be considered will be the plaintiff who filed an application and Authorization.

1. Ryan James Reeder Dn# 19B1469

2. _____

-VS-

B. **Full Name(s) of Defendant(s)** NOTE: Pursuant to Fed.R.Civ.P. 10(a), the names of all parties must appear in the caption. The court may not consider a claim against anyone not identified in this section as a defendant. If you have more than six defendants, you may continue this section on another sheet of paper if you indicate below that you have done so.

1. Brian D. Dennis

4. Steven Vine

2. James B. Ritts

5. Michael Stroh

3. William J. Hart

6. _____

2. STATEMENT OF JURISDICTION

This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over the action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4), and 2201.

3. PARTIES TO THIS ACTION

PLAINTIFF'S INFORMATION NOTE: To list additional plaintiffs, use this format on another sheet of paper.

Name and Prisoner Number of Plaintiff: Ryan James Reeder Dn# 19B1469

Present Place of Confinement & Address: Attica Correctional Facility, 639 Exchange Street, Attica, NY 14011-9647

Name and Prisoner Number of Plaintiff: _____

Present Place of Confinement & Address: _____

DEFENDANT'S INFORMATION NOTE: To provide information about more defendants than there is room for here, use this format on another sheet of paper.

Name of Defendant: Honorable Brian D. Dennis
(If applicable) Official Position of Defendant: Ontario County Superior Court Judge
(If applicable) Defendant is Sued in ☒ Individual and/or ☒ Official Capacity
Address of Defendant: 27 North Main Street, 1st floor Room 130,
Canandaigua, NY 14424

Name of Defendant: James B. Ritts (DA)
(If applicable) Official Position of Defendant: Ontario County District Attorney
(If applicable) Defendant is Sued in ☒ Individual and/or ☒ Official Capacity
Address of Defendant: 27 North Main Street, District Attorneys office,
Canandaigua, NY 14424

Name of Defendant: William J. Hart (ADA)
(If applicable) Official Position of Defendant: Assistant District Attorney, Geneva City Court
(If applicable) Defendant is Sued in ☒ Individual and/or ☒ Official Capacity
Address of Defendant: 27 North Main Street, District Attorneys office,
Canandaigua, NY 14424

* Continued with 2 more defendant on separate sheet *

4. PREVIOUS LAWSUITS IN STATE AND FEDERAL COURT

- A. Have you begun any other lawsuits in state or federal court dealing with the same facts involved in this action?
Yes ☐ No ☒

If Yes, complete the next section. NOTE: If you have brought more than one lawsuit dealing with the same facts as this action, use this format to describe the other action(s) on another sheet of paper.

1. Name(s) of the parties to this other lawsuit:
Plaintiff(s): _____
Defendant(s): _____
2. Court (if federal court, name the district; if state court, name the county): _____
3. Docket or Index Number: _____
4. Name of Judge to whom case was assigned: _____

Defendants Information Continued

Name of Defendant: Detective Steven Vihne

Official position of Defendant: Detective, Narcotics Division, Geneva Police Dept.

Defendant is Sued in ☒ Individual and/or ☒ official capacity

Address of Defendant: Geneva Police Dept, Detective Steven Vihne, 255
Exchange Street, Geneva, NY 14456

Name of Defendant: Investigator Michael Strahm

Official position of Defendant: Investigator, Seneca County Sheriff's Dept.

Defendant is Sued in ☒ Individual and/or ☒ official capacity

Address of Defendant: Seneca County Sheriff's Dept. 6150 State
Route 96, Romulus, NY 14541

5. The approximate date the action was filed: _____

6. What was the disposition of the case?

Is it still pending? Yes _____ No _____

If not, give the approximate date it was resolved. _____

Disposition (check the statements which apply):

_____ Dismissed (check the box which indicates why it was dismissed):

_____ By court *sua sponte* as frivolous, malicious or for failing to state a claim upon which relief can be granted;

_____ By court for failure to exhaust administrative remedies;

_____ By court for failure to prosecute, pay filing fee or otherwise respond to a court order;

_____ By court due to your voluntary withdrawal of claim;

_____ Judgment upon motion or after trial entered for

_____ plaintiff

_____ defendant.

B. Have you begun **any other lawsuits in federal court which relate to your imprisonment?**

Yes _____ No ☒

If Yes, complete the next section. NOTE: *If you have brought more than one other lawsuit dealing with your imprisonment, use this same format to describe the other action(s) on another sheet of paper.*

1. Name(s) of the parties to this other lawsuit:

Plaintiff(s): _____

Defendant(s): _____

2. District Court: _____

3. Docket Number: _____

4. Name of District or Magistrate Judge to whom case was assigned: _____

5. The approximate date the action was filed: _____

6. What was the disposition of the case?

Is it still pending? Yes _____ No _____

If not, give the approximate date it was resolved. _____

Disposition (check the statements which apply):

☐ Dismissed (check the box which indicates why it was dismissed):

- ☐ By court *sua sponte* as frivolous, malicious or for failing to state a claim upon which relief can be granted;
- ☐ By court for failure to exhaust administrative remedies;
- ☐ By court for failure to prosecute, pay filing fee or otherwise respond to a court order;
- ☐ By court due to your voluntary withdrawal of claim;

☐ Judgment upon motion or after trial entered for

- ☐ plaintiff
- ☐ defendant.

5. STATEMENT OF CLAIM

For your information, the following is a list of some of the most frequently raised grounds for relief in proceedings under 42 U.S.C. § 1983. (This list does not include all possible claims.)

- | | | |
|--------------------|------------------------|-------------------------------|
| • Religion | • Access to the Courts | • Search & Seizure |
| • Free Speech | • False Arrest | • Malicious Prosecution |
| • Due Process | • Excessive Force | • Denial of Medical Treatment |
| • Equal Protection | • Failure to Protect | • Right to Counsel |

Please note that it is not enough to just list the ground(s) for your action. You **must** include a statement of the facts which you believe support each of your claims. In other words, tell the story of what happened to you but do not use legal jargon.

Fed.R.Civ.P. 8(a) states that a pleading must contain "a short and plain statement of the claim showing that the pleader is entitled to relief." "The function of pleadings under the Federal Rules is to give fair notice of the claim asserted. Fair notice is that which will enable the adverse party to answer and prepare for trial, allow the application of res judicata, and identify the nature of the case so it may be assigned the proper form of trial." Simmons v. Abruzzo, 49 F.3d 83, 86 (2d Cir. 1995). **Fed.R.Civ.P. 10(b)** states that "[a]ll averments of claim ... shall be made in numbered paragraphs, the contents of each of which shall be limited as far as practicable to a single set of circumstances."

Exhaustion of Administrative Remedies

Note that according to 42 U.S.C. § 1997e(a), "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prison er confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

You must provide information about the extent of your efforts to grieve, appeal, or otherwise exhaust your administrative remedies, and you must attach copies of any decisions or other documents which indicate that you have exhausted your remedies for each claim you assert in this action.

A. FIRST CLAIM: On (date of the incident) August 1, 2018 (Dismissal) 10/10/17 to 3/13/18 (Confined),
defendant (give the **name and position held** of **each defendant** involved in this incident) Honorable Brian
D. Dennis, Superior Court Judge of Ontario County Court

did the following to me (briefly state what each defendant named above did): Either willingly and intentionally
dismiss my case under false pretenses so as to not ruin probable cause
for a case that arose from the stop on 10/10/17 with which I was
arrested on these charges. Judge Dennis failed to preside over this
case and perform his due diligence creating a negligent environment
which kept me wrongfully and unlawfully confined from 10/10/17
to 3/13/18

The constitutional basis for this claim under 42 U.S.C. § 1983 is: Violation of due process, Abuse of
process, judicial misconduct, wrongful and unlawful confinement

The relief I am seeking for this claim is (briefly state the relief sought): I would like the facts
of my case investigated and I would like \$250,000.00 in
damages, (pain and suffering, loss of wages), child support arrears

Exhaustion of Your Administrative Remedies for this Claim:

Did you grieve or appeal this claim? Yes ☒ No If yes, what was the result?

Did you appeal that decision? Yes ☒ No If yes, what was the result?

Attach copies of any documents that indicate that you have exhausted this claim.

If you did not exhaust your administrative remedies, state why you did not do so: This case was eventually
dismissed after 10 months under false pretenses

A. SECOND CLAIM: On (date of the incident) ,
defendant (give the **name and position held** of **each defendant** involved in this incident) District Attorney
James B. Ritts, Ontario County District Attorney

did the following to me (briefly state what each defendant named above did): Did knowingly or intentionally try to prosecute me for a case with which there was no evidence to support the charges. It is also possible he was just negligent in his duties which denied my due process. DA Ritts did discriminate against me because of a case in 2014 which I had dismissed and therefore demanded revenge or retribution in his eyes. DA Ritts was malicious in his pursuit of this case from the beginning. I was incarcerated from 10/10/17 until 3/13/18 on these false charges. Case was dismissed on August 1, 2018

The constitutional basis for this claim under 42 U.S.C. § 1983 is: Malicious Prosecution, Negligence, Unlawful and wrongful confinement, Due Process and/or Abuse of process.

The relief I am seeking for this claim is (briefly state the relief sought): I would like the facts of this case investigated and \$250,000.00 in damages awarded. (Pain and suffering, loss of wages), Child support Arrearages

Exhaustion of Your Administrative Remedies for this Claim:

Did you grieve or appeal this claim? _____ Yes ☒ No _____ If yes, what was the result? _____

Did you appeal that decision? _____ Yes ☒ No _____ If yes, what was the result? _____

Attach copies of any documents that indicate that you have exhausted this claim.

If you did not exhaust your administrative remedies, state why you did not do so: Case was dismissed but under false pretenses to save probable cause for another case.

If you have additional claims, use the above format and set them out on additional sheets of paper.

6. RELIEF SOUGHT

Summarize the relief requested by you in each statement of claim above.

I am seeking an investigation into all of the defendants actions in these matters, ongoing and past alike. I am also seeking \$250,000.00 in damages from EACH of the defendants

Do you want a jury trial? Yes ☒ No _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/18/19
(date)

NOTE: *Each plaintiff must sign this complaint and must also sign all subsequent papers filed with the Court.*

Ryan James Heide

Signature(s) of Plaintiff(s)

A. 3rd Claim: On (date of the incident) 10/16/17 and 10/22/17
defendant(give the name and position held of each defendant involved
in this incident) William J. Hart, Assistant District Attorney
of Ontario County, Geneva City Court

did the following to me: On these 2 dates referenced above, deny
me a preliminary hearing that would have, if given, been an instrument
in my release from custody as there was no evidence to support the
cases being sent to the grand jury and would have stopped me
from being indicted on crimes I did not commit. As a result I
was wrongfully and unlawfully detained, held against my will,
and confined from 10/16/17 to 3/13/18. These cases were dismissed
August, 1 2018 because there was no evidence to support such
charges.

THE CONSTITUTIONAL basis for this claim under 42 u.s.c §1983 is:

Abuse of process, Violation of Due process, malicious prosecution,
wrongful and unlawful confinement

The relief I am seeking for this claim is: I would like a formal investigation
for this matter and \$250,000.00 in Damages

Exhaustion of YOUR Administrative Remedies:

Did you grieve or appeal this claim? YES X NO If yes, what result?

Did you appeal that decision? YES X NO If yes to what result?

Attach copies of documents proving exhaustion
of claim

IF you did not exhaust your administrative remedies, state why you
did not do so: Case was dismissed under false pretenses and

I was in the process of retaining legal counsel for filing
claim when I was targeted again and confined unlawfully
and wrongfully.

A. 4th Claim: On (date of the incident) 10/10/17 (date of Arrest) 9/7/17 and 9/8/17
defendant (give the name and position held of each defendant involved ^(alleged sales)
in this incident) Detective Steven Vine, Detective of Geneva
Police Department, Ontario County

did the following to me: Intentionally and maliciously falsely arrest
me and fabricate evidence and testimony that lead to my
wrongful and unlawful confinement from 10/10/17 to 3/13/18.
Detective Vine manipulated the court with claim of evidence with
which there was none and testimony that was untruthful
so as to keep me confined under false pretenses and
also lead to a conviction in Seneca County, that case is
still under Direct Appeal.

THE CONSTITUTIONAL basis for this claim under 42 u.s.c §1983 is:
False Arrest, Violation of Due process, Abuse of process, police misconduct

The relief I am seeking for this claim is: I would like a formal
investigation on this matter and \$250,000.00 in damages

Exhaustion of YOUR Administrative Remedies:

Did you grieve or appeal this claim? YES X NO If yes, what result?

Did you appeal that decision? YES X NO If yes to what result?

Attach copies of documents proving exhaustion
of claim

IF you did not exhaust your administrative remedies, state why you
did not do so: Case was dismissed Aug 1, 2018 under false

pretenses. I was in the process of retaining legal counsel
for filing a claim in the court of claims when I was
targeted once again and confined again for crimes that did not
fit the charges.

A. 5th Claim: On (date of the incident) 10/10/17 (Arrest Date) 9/8/17 and 9/2/17 (Alleged crimes)
defendant (give the name and position held of each defendant involved
in this incident) Investigator Michael Strohm, Investigator for
Seneca County Sheriff's Department

did the following to me: Did intentionally and maliciously make
false claims and falsely Arrest me and fabricate evidence
and eye witness testimony that kept me confined from
10/10/17 to 3/13/18. Investigator Strohm lied, manipulated
the courts, due process and my due process. Investigator
Strohm with held evidence of a so called investigation
because it was exculpatory in nature and would have
proved my testimony and claim of how the events really
happened.

THE CONSTITUTIONAL basis for this claim under 42 u.s.c §1983 is:
Violation of Due Process, False Arrest, Abuse of Process,
Police Misconduct

The relief I am seeking for this claim is: I would like this situation
investigated and \$250,000.00 in damages from Investigator
Strohm.

Exhaustion of YOUR Administrative Remedies:

Did you grieve or appeal this claim? YES X NO If yes, what result?

Did you appeal that decision? YES X NO If yes to what result?

Attach copies of documents proving exhaustion

of claim

IF you did not exhaust your administrative remedies, state why you
did not do so: Case was dismissed under false Pretenses

Aug 1, 2018. I was in the middle of trying to retain
counsel for a claim against this individual when he went
out of his way to target me and wrongfully confined me once
again.